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**Attorneys for Plaintiff and the Putative Class**

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

**Victorino Guerrero**, individually and on behalf of all similarly situated individuals;

**Plaintiff,**

vs.

**SPB Hospitality LLC**, a Delaware limited liability company; **Craft Brewery Group, LLC**, a Delaware limited liability company, **Gordon Biersch Group LLC**, a Delaware limited liability company; and **Does 1-10**, inclusive;

## Defendants.

CASE NO. 2:23-cv-09112-FMO-SK

[Assigned to Hon. Fernando M. Olguin]

**NOTICE OF SETTLEMENT OF  
ENTIRE CASE**

Case Filed: September 25, 2023

Removal Date: October 27, 2023

1                   **TO THE COURT, AND TO ALL PARTIES AND THEIR COUNSEL OF**  
2                   **RECORD:**

3                   **PLEASE TAKE NOTICE** that Plaintiff Victorino Guerrero (“Plaintiff”) respect-  
4                   fully submits this Notice of Settlement and requests as follows:

5                   After a fulsome informal exchange of information, and in light of their factual investi-  
6                   gation, Class Counsel does not believe that it appropriate to maintain the Class or Repre-  
7                   sentative claims due to the burden of proof in proving those claims in light of the information  
8                   provided by Defendants.

9                   Alongside that determination, the Parties have reached an individual settlement in the  
10                  above-captioned matter.

11                  The Parties hereby respectfully request 15 days in which to file dispositional docu-  
12                  ments, including a request for an order dismissing the class and PAGA claims without preju-  
13                  dice, and further request that the Court vacate all currently pending hearings and related  
14                  dates in this matter.

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17                  DATED: February 26, 2024

**KING & SIEGEL LLP**

19                  By: Elliot J. Siegel  
20                  Elliot J. Siegel

21                  Attorneys for Plaintiff and the Putative  
Class

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